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 UNITED STATES DEPARTMENT OF
 HEALTH AND HUMAN SERVICES

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

THE CENTER FOR INVESTIGATIVE)	NO. 20-CV-00608-SK
REPORTING and AURA BOGADO,)	
)	JOINT CASE MANAGEMENT STATEMENT
Plaintiffs,)	AND [PROPOSED] ORDER
)	
v.)	
)	
UNITED STATES DEPARTMENT OF)	
HEALTH AND HUMAN SERVICES,)	
)	
Defendant.)	

Pursuant to the stipulations of plaintiffs The Center for Investigative Reporting and Aura Bogado (“Plaintiffs”) and defendant United States Department of Health and Human Services (“Defendant”), ECF Nos. 17, 19 & 20, the Court continued the initial case management conference (“CMC”) in this action to August 24, 2020 at 1:30 p.m. and required the parties to provide a further joint case management statement by August 17, 2020. ECF No. 21. The parties respectfully submit this joint case management statement.

At the time of the parties’ prior stipulations, the parties reported that they were engaged in cooperative and productive communications regarding the documents sought in Plaintiffs’ five FOIA requests that are the subject of this litigation, and the search for and release of responsive records. ECF Nos. 17, 19 & 20. The parties noted that Defendant had completed searches for certain subparts of

Plaintiffs' requests, began its production of responsive documents, and the parties continued to make significant progress toward resolving the remainder of Plaintiffs' requests. *Id.* The parties also reported that they would provide the Court with another joint status report and either request a further continuance of the CMC or, if the need arose, request to appear at the CMC. *Id.* The parties respectfully submitted that this would be the most efficient manner to proceed and would conserve the parties' and Court's resources. *Id.*

Since the date of their prior stipulation, the parties have continued to meet and confer cooperatively and productively regarding the release of documents sought in Plaintiffs' FOIA requests. Given that these efforts are ongoing, the parties respectfully request that the Court further continue the parties' CMC from August 24, 2020 to **September 28, 2020**, to give the parties additional time to meet and confer and give Defendant additional time to search for and release responsive records.

In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all signatories listed below concur in the filing of this document.

DATED: August 13, 2020

Respectfully submitted,

DAVID L. ANDERSON
United States Attorney

/s/ Savith Iyengar
SAVITH IYENGAR
Assistant United States Attorney

Attorneys for Defendant

DATED: August 13, 2020

THE CENTER FOR INVESTIGATIVE
REPORTING

D. Victoria Baranetsky
D. VICTORIA BARANETSKY

Attorneys for Plaintiffs

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[PROPOSED] ORDER

Upon the parties' request, the Court HEREBY CONTINUES the case management conference from August 24, 2020 to September 28, 2020. The parties shall file a further case management statement by no later than September 21, 2020.

IT IS SO ORDERED.

Dated:

SALLIE KIM
United States Magistrate Judge